

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Proceeding by the Department of Telecommunications )  
And Energy on its own Motion to Develop Requirements ) DTE 02-28  
For Mass Migrations of Telecommunications Service )  
End Users )

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**PETITION TO INTERVENE OF  
AT&T AND AT&T BROADBAND PHONE OF MASSACHUSETTS, LLC.**

AT&T Communications of New England (“AT&T”) and AT&T Broadband Phone of Massachusetts, LLC (“AT&T Broadband”) hereby petition, pursuant to 220 CMR § 1.03 to intervene as a party in the above captioned proceeding. As grounds for this petition, AT&T and AT&T Broadband state as follows:

1. AT&T and AT&T Broadband are facilities-based competitive local exchange providers in Massachusetts. AT&T provides local business services, and AT&T Broadband is a provider of residential telephone service in the Commonwealth of Massachusetts. AT&T Broadband provides residential intraLATA local and intraLATA toll telephone service in Massachusetts.
2. AT&T and AT&T Broadband participated in the industry collaborative which submitted to the Department Draft Guidelines for Mass Migration Procedures on June 7, 2002.
3. As Massachusetts competitive local exchange providers, AT&T and AT&T Broadband would be subject to final Mass Migration Procedures as adopted by the Department. As such, AT&T

and AT&T Broadband will be substantially and specifically affected by this investigation and have a substantial interest in the outcome of this proceeding.

4. The extent of AT&T and AT&T Broadband's participation in this docket is dependent upon the scope of this proceeding. We may file comments or testimony, as well as participate in discovery, hearings, briefs and other aspects of this investigation if necessary.

**WHEREFORE**, for the foregoing reasons, AT&T and AT&T Broadband request that the Department grant it leave to intervene as a party in this proceeding.

Respectfully submitted,

**AT&T Broadband Phone of  
Massachusetts, LLC.**

**AT&T Communications of New England**

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